

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, ACCIPITER HOLDINGS DAC,
CARLYLE AVIATION MANAGEMENT
LIMITED, MAVERICK AVIATION
HOLDINGS LIMITED, MANCHESTER
AVIATION FINANCE S.A.R.L., VERMILLION
AVIATION HOLDINGS LIMITED, WELLS
FARGO TRUST COMPANY, N.A., solely in its
capacity as OWNER TRUSTEE, and UMB
BANK, N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

Case No.: 1:22-cv-02943 (PAE)

**DECLARATION OF JED M. SCHWARTZ IN SUPPORT OF DEFENDANTS' MOTION
TO ALTER OR AMEND THE COURT'S JULY 18, 2023 ORDER GRANTING
PLAINTIFF'S APPLICATION TO CONVERT TEMPORARY
RESTRAINING ORDER TO PRELIMINARY INJUNCTION**

I, Jed. M. Schwartz, hereby declare as follows:

1. I am a member of the law firm Milbank LLP, counsel to Defendants Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee ("Wells Fargo"), and UMB Bank, N.A., solely in its capacity as Owner Trustee ("UMB"), in the above-captioned action. I am a member in good standing of the bar of the State of New York and of this Court.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the Court's July 18, 2023 hearing on Frontier's application to convert the temporary restraining order to a preliminary injunction.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the unexecuted guaranty that Defendants provided to Frontier on August 1, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 2, 2023

/s/ Jed M. Schwartz
Jed M. Schwartz